

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MUEIN DAOUD,)	
)	
Plaintiff,)	Case No.: 21-cv-6663
)	
v.)	
)	
The City of Chicago, Chicago Police)	Honorable Jorge L. Alonso
Lieutenant Shoshi, Star No. 236, Officer)	
Manuel Paredes, Star No. 16850, Sergeant)	Magistrate Heather K. McShain
Chatty, Unknown And Unnamed Officers,)	
Wow Chicago, David Sonna, UCG)	
Associates, Inc., Anthony Caruso, and)	
Unknown And Unnamed Security Guard,)	
)	
Defendants.)	

DECLARATION OF PETER T. SADELSKI

1. I know the facts set forth to be true to my knowledge. I could and would do so if called upon to testify to these facts.

2. I graduated from the University of Illinois Chicago School of Law in May 2021 and thus have been an attorney for over a year.

3. I am licensed to practice in the State of Illinois. I have been licensed to practice in Illinois since November 10, 2021. I have been an associate at Ed Fox & Associates, Ltd. for six months (I was hired in March 2022). I am admitted to practice in the Northern District of Illinois as well as the Central District of Illinois.

4. During my six months with Ed Fox & Associates, Ltd. I have practiced exclusively in the area of civil rights. Before practicing in this field, I practiced personal injury law.

5. I have appeared in approximately twenty-five cases in the Northern District of Illinois and approximately three cases in the Central District of Illinois.

6. Prior to being employed as a lawyer, I focused my studies on constitutional and criminal law. I clerked at the Cook County Public Defender's Office while in law school.

7. In a 2018 decision in the Northern District of Illinois case of *Adamik v. Motyka*, 12 C 3810, 2018 WL 3574751, at *5 (N.D. Ill. July 25, 2018), Judge Durkin awarded an attorney from a Chicago-based Civil Rights firm with about three years of experience, at that time, a rate of \$250 an hour based on the work she did on the case in the early phases of litigation in 2012-2013. In reaching his decision, Judge Dunkin cited *Warfield v. City of Chicago*, 733. Supp. 2d 950 (N.D. Ill. 2010), where a second-year attorney in a civil rights case was awarded \$250 per hour.

8. In a 2019 decision in the Northern District of Illinois case of *Teague v. Miehle*, 14 C 6950, 2019 WL 1253985, at *4 (N.D. Ill. Mar. 19, 2019), Judge Ellis awarded an attorney from a Chicago-based Civil Rights firm with less than a year of experience, at that time, a rate of \$230 an hour based on the work she did after being admitted to the bar compared to a rate of \$125 per hour based on the work she did before being admitted to the bar. In reaching her decision, Judge Ellis cited *Baker v. Ghidotti*, 11 C 4197, 2018 WL 1610263, at *2 (N.D. Ill. Apr. 3, 2018), where a first-year attorney in a civil rights case was awarded \$230 per hour.

9. Accordingly, when accounting for inflation, the usual and customary rate for attorneys with similar experience in the Northern District of Illinois is \$300 per hour.

10. The Laffey Matrix suggests that attorneys within the District of Columbia Circuit Court with one to three years of experience as of 2021-2022 should be awarded \$381 per hour. *Exhibit 1*. However, courts outside the District of Columbia typically adjust the Laffey Matrix for “local pay differentials.” Courts in the Northern District of Illinois have allowed “local pay differentials” based upon higher rates of practicing attorneys in the City of Chicago of up to 1.1%. See *Schultz v. City of Burbank*, 2007 WL 1099479, *2 (N.D. Ill Apr. 10, 2007 (M.J. Soat Brown) (adding 4% to the Laffey Matrix based on rates in Chicago); *Berg v. Culhane*, 2011 WL 589631, *2 (N.D. Ill. Feb 10, 2011) (J. Kendall) (citing with approval upward adjustment of rates); *In re Trans Union Corp Privacy Litig.*, 2009) (J. Gettleman) (adjusting Laffey Matrix upwards 1.1%)

11. A 1.1% Chicago “locality pay adjustment” to the proposed Laffey Matrix rate of \$381 per hour allows an hourly rate of \$419.1 for an attorney with one to three years of experience like myself.

12. In this matter, I am requesting \$300 per hour due to the nature of the case, my involvement in the case, my experience, and the market rate for attorneys of my experience.

13. Attached is a summary of my time entries for the Daoud v. The City of Chicago case. *Exhibit 2.*

I declare under penalty of perjury that the foregoing is true and correct. Executed in Chicago, Illinois, this September 8, 2022.

/s/ Peter T. Sadelski
Peter T. Sadelski

LAFFEY MATRIX

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			Years Out of Law School *				
Year	Adjustmt Factor**	Paralegal/ Law Clerk	1-3	4-7	8-10	11-19	20 +
6/01/21- 5/31/22	1.006053	\$208	\$381	\$468	\$676	\$764	\$919
6/01/20- 5/31/21	1.015894	\$206	\$378	\$465	\$672	\$759	\$914
6/01/19- 5/31/20	1.0049	\$203	\$372	\$458	\$661	\$747	\$899
6/01/18- 5/31/19	1.0350	\$202	\$371	\$455	\$658	\$742	\$894
6/01/17- 5/31/18	1.0463	\$196	\$359	\$440	\$636	\$717	\$864
6/01/16- 5/31/17	1.0369	\$187	\$343	\$421	\$608	\$685	\$826
6/01/15- 5/31/16	1.0089	\$180	\$331	\$406	\$586	\$661	\$796
6/01/14- 5/31/15	1.0235	\$179	\$328	\$402	\$581	\$655	\$789
6/01/13- 5/31/14	1.0244	\$175	\$320	\$393	\$567	\$640	\$771
6/01/12- 5/31/13	1.0258	\$170	\$312	\$383	\$554	\$625	\$753
6/01/11- 5/31/12	1.0352	\$166	\$305	\$374	\$540	\$609	\$734
6/01/10- 5/31/11	1.0337	\$161	\$294	\$361	\$522	\$589	\$709
6/01/09- 5/31/10	1.0220	\$155	\$285	\$349	\$505	\$569	\$686
6/01/08- 5/31/09	1.0399	\$152	\$279	\$342	\$494	\$557	\$671
6/01/07-5/31/08	1.0516	\$146	\$268	\$329	\$475	\$536	\$645
6/01/06-5/31/07	1.0256	\$139	\$255	\$313	\$452	\$509	\$614
6/1/05-5/31/06	1.0427	\$136	\$249	\$305	\$441	\$497	\$598
6/1/04-5/31/05	1.0455	\$130	\$239	\$293	\$423	\$476	\$574
6/1/03-6/1/04	1.0507	\$124	\$228	\$280	\$405	\$456	\$549
6/1/02-5/31/03	1.0727	\$118	\$217	\$267	\$385	\$434	\$522
6/1/01-5/31/02	1.0407	\$110	\$203	\$249	\$359	\$404	\$487
6/1/00-5/31/01	1.0529	\$106	\$195	\$239	\$345	\$388	\$468
6/1/99-5/31/00	1.0491	\$101	\$185	\$227	\$328	\$369	\$444
6/1/98-5/31/99	1.0439	\$96	\$176	\$216	\$312	\$352	\$424
6/1/97-5/31/98	1.0419	\$92	\$169	\$207	\$299	\$337	\$406
6/1/96-5/31/97	1.0396	\$88	\$162	\$198	\$287	\$323	\$389
6/1/95-5/31/96	1.032	\$85	\$155	\$191	\$276	\$311	\$375
6/1/94-5/31/95	1.0237	\$82	\$151	\$185	\$267	\$301	\$363

The methodology of calculation and benchmarking for this Updated Laffey Matrix has been

approved in a number of cases. See, e.g., *DL v. District of Columbia*, 267 F.Supp.3d 55, 69 (D.D.C. 2017)

* “Years Out of Law School” is calculated from June 1 of each year, when most law students graduate. “1-3” includes an attorney in his 1st, 2nd and 3rd years of practice, measured from date of graduation (June 1). “4-7” applies to attorneys in their 4th, 5th, 6th and 7th years of practice. An attorney who graduated in May 1996 would be in tier “1-3” from June 1, 1996 until May 31, 1999, would move into tier “4-7” on June 1, 1999, and tier “8-10” on June 1, 2003.

** The Adjustment Factor refers to the nation-wide Legal Services Component of the Consumer Price Index produced by the Bureau of Labor Statistics of the United States Department of Labor.

Attorney Peter T. Sadelski Hours

DATE	SUMMARY	HOURS
9/7/2022	research and draft motion for the costs of service of process and the associated attorney's fees	4
9/8/2022	research attorney fee rates in NDIL, draft declaration	4
9/8/2022	prepare summary of attorney fees and hours, discuss with Ed	1